

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

CR123-011

UNITED STATES OF AMERICA) INFORMATION NO.
)
 v.) 18 U.S.C. § 2251(b)
) Production of Child Pornography by
 EDMUND BROWN) a Parent or Guardian

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

Production of Child Pornography by a Parent or Guardian
18 U.S.C. § 2251(b)

From on or about June 19, 2019, through May 12, 2022, in Columbia
County, within the Southern District of Georgia, the defendant,

EDMUND BROWN,

having custody and control of minor victim 1 (MV1), knowingly employed and
used MV1, a minor whose identity is known to the Grand Jury, to engage in
sexually explicit conduct for the purpose of producing a visual depiction of such
conduct, and that visual depiction was produced using materials that had been
mailed, shipped and transported in or affecting interstate and foreign commerce
by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(b).

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COUNT TWO

Production of Child Pornography by a Parent or Guardian
18 U.S.C. § 2251(b)

From on or about June 19, 2019, through May 12, 2022, in Columbia County, within the Southern District of Georgia, the defendant,

EDMUND BROWN,

having custody and control of minor victim 2 (MV2), knowingly employed and used MV2, a minor whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and that visual depiction was produced using materials that had been mailed, shipped and transported in or affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18 United States Code Section 2251(b).

FORFEITURE ALLEGATION

The allegations contained in Counts One and Two of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 2253 and 2428.

Upon conviction of the offense set forth in Counts One and Two of this Information, the defendant,

EDMUND BROWN ,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Sections 2253(a)(1) and (a)(3), any visual depiction described in Title 18, United States Code, Section 2251 or any matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110 and any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable thereto.

If any of the property described above, as a result of any act or omission of the defendant[s]:

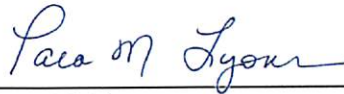
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

Signatures of the Attorneys for the Government:



David H. Estes
United States Attorney



Tara M. Lyons
Assistant United States Attorney
Deputy Chief, Criminal Division
*Lead Counsel



Patricia G. Rhodes
Assistant United States Attorney
Chief, Criminal Division